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January 25, 2002

Mary L. Cottrell, Secretary
Department of Telecommunications & Energy
Commonwealth of Massachusetts
One South Station, Second Floor
Boston, MA 02110

Re: D.T.E. 01-39 – Joint Request for Modification of Procedural Schedule

Dear Ms. Cottrell:

By this letter Verizon Massachusetts (“Verizon MA”), on behalf of itself and Covad Communications Company, respectfully requests that the Department modify the current procedural schedule in the above-referenced proceeding for all parties as set forth below. The parties to this proceeding continue to pursue settlement of this matter, and the requested modification of the procedural schedule will provide an additional opportunity for the possible resolution of this matter without the need for additional proceedings.

In addition, Counsel for Verizon MA is currently scheduled to take the Rhode Island Bar Examination on February 25 and 26, 2002. The revised schedule will allow counsel for Verizon MA to adequately prepare for the hearing and brief should this matter not be resolved. Finally, this request also seeks to modify the date by which the responses to the discovery recently issued by Verizon MA to Covad and the Department to both parties will be due. Both parties require additional time to prepare their responses to these requests, and no party will be prejudiced by such an extension since the proposed schedule modification will provide ample time for parties and the Department to review the responses to these discovery requests prior to the hearing.

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For all of the foregoing reasons, Verizon MA respectfully requests that the Department modify the procedural schedule in accordance with the following proposed schedule mutually agreed upon by the parties:

02/20/02	All Outstanding Discovery Responses Due
03/12/02	Evidentiary hearing
03/19/02	Responses to Record Requests Due
03/26/02	Initial Briefs Due
04/12/02	Reply Briefs Due

Thank you for your assistance in this matter.

Very truly yours,

/s/Keefe B. Clemons

Keefe B. Clemons

cc: Jesse Reyes, Esquire, Hearing Officer
Tina Chin, Esquire, Hearing Officer
Michael Isenberg, Esquire, Director-Telecommunications Division
Attached Service List